



March 1999

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

To whom it may concern:

I am responding to your request for comments from the public regarding the labeling of irradiated foods. I believe strongly that we consumers have the right to make informed decisions about the food we buy and that we have the right to decide for ourselves whether we feel safe eating irradiated foods. I therefore support mandatory labeling of foods treated with irradiation. I also urge you to keep this mandate in effect without a year or expiration.

My main concern about the safety of irradiated foods stems from the fact that the irradiation process knocks electrons out of atoms, creating free radicals, that react with other food components to form toxins, such as benzene, formaldehyde and lipid peroxides - some of which may be unique to irradiated foods. There are no conclusive studies to date showing the long-term effect of these poisons on the human body, but in the meantime I would like to know whether the food I eat is creating these potentially dangerous radiolytic products.

Irradiation also damages the quality of many foods. Studies have shown that most irradiated foods lose at least twenty percent of vitamins C, E, K and B-complex. While irradiation is hailed by industry proponents as a means to allow food to be stored longer, the process itself breaks down the cell walls of food, causing it to lose up to seventy to eighty percent of its vitamin content if stored for a long period of time.

Finally, I am deeply concerned about the environmental hazards of widespread irradiation. Nuclear irradiation facilities are prone to accidents, in which workers get exposed to radiation. Transporting radioactive materials between these facilities also has inherent risks. As a consumer, I ask you to uphold my right to know whether my purchase is supporting this process.

For the sake of ethical business and informed consumer choice, I ask you to uphold our right to know whether we are consuming irradiated food. I urge you to continue indefinitely to mandate the disclosure statement, prominent in larger print than the list of ingredients. I am also aware that companies are only mandated to print a disclosure statement when the entire product is treated by irradiation. I ask that you expand the disclosure law to include all foods in which any ingredients are treated with irradiation.

I ALSO STRONGLY SUPPORT LABELLING OF GENETICALLY ENGINEERED FOODS, AND NOT CHANGING (AND RENDERING MEANINGLESS) the 'ORGANICALLY GROWN' LABEL.

Sincerely Yours,

Printed Name BENJAMIN C. HALL

Signature B. J. Hall

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